



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: September 14, 2009

SUBJ: Site Investigation Closure Memorandum
Parsons Paper Mill Site
Holyoke, MA

FROM: Athanasios Hatzopoulos, On-Scene Coordinator
Emergency Response and Removal Section II, EPRB, OSRR

THRU: Steven Novick, Chief
Emergency Response and Removal Section II, EPRB, OSRR

TO: Parsons Paper Mill Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Parsons Paper Mill Site ("Site") in Holyoke, MA. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
 - a. The Removal Site Evaluation consisted of the following actions.
 - i. Review of the analytical results on samples collected on September 2, 2009, by Weston Solutions, Inc. Superfund technical Assessment and Response Team 2000 (START).
 - ii. Review of the analytical results of samples collected in August 2008, by MassDEP and Tighe & Bond (a consultant to the owner of the Site).
 - b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

Hazardous Substances
or Pollutants or Contaminants

Media

Friable asbestos

Insulation, roofing material

2. Evaluation of the threat to public health, welfare and the environment

a. Federal Agency for Toxic Substances and Disease Registry:

Threat_____ No Threat_____ Evaluation Not Necessary_x____

b. Endangerment to the ecosystem:

Threat_____ No Threat_____ Evaluation Not Necessary_x____

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason.

- ☐ There is no release.
- ☐ The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- ☐ The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
- ☐ It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
 - ☐ of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
 - ☐ from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.
 - ☐ into public or private drinking water supplies due to deterioration of the system through ordinary use.
- ☐ The amount, quantity, or concentration released does not warrant a Federal response.
- ☐ A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
- ☒ The Removal Site Evaluation is complete.

4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

- a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.

- b. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency____ Time-Critical x Non Time-Critical____

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.
- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.
- () There is a release, or potential threat of release, as governed by the CWA as amended by OPA.
- (x) There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.
- b. The absence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP **is not** necessary.

cc: David McIntyre, Chief, Emergency Response and Removal Section I, OSRR (w/o attachments)
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR (w/o attachments)